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**From:** Russel Honore' [russel.honore'  
**Sent:** 3/6/2023 10:13:17 PM  
**To:** Anne Rolfes [anne@labucketbrigade.org]; Larry Shapiro [lshapiro@rffund.org]  
**Subject:** Fwd: Fw: Comments Lotte Air Permit Modification

FYI great work by Mike

----- Forwarded message -----

**From:** **Michael Tritico** <michaeltritic  
**Date:** Mon, Mar 6, 2023 at 1:15 PM  
**Subject:** Fw: Comments Lotte Air Permit Modification  
**To:**

When "routine" obscures things...

Michael Tritico  
**Restore Explicit Symmetry To Our Ravaged Earth**

----- Forwarded Message -----m

**From:** Michael Tritico <michaeltritic  
**To:** LADEQ DEQ <deq.publicnotices@la.gov>  
**Sent:** Monday, March 6, 2023 at 01:07:30 PM CST  
**Subject:** Comments Lotte Air Permit Modification

**RESTORE**  
P.O. Box 233  
Longville, LA 70652  
(337)-725-3690  
michaeltritic

03/06/2023

LDEQ Public Participation Group  
P.O. Box 4313  
Baton Rouge, LA 70821-4313

Re: AI Number 203831 Permit Number 3136-V3 and Activity Number PER20220003  
LACC, LLC US/Ethylene and Derivatives Plant {Lotte}  
Proposed Part 70 Air Operating Permit Modification

Dear Public Participation Group:

I have reviewed the 187 pages of EDMS Document Number 13633460. I have the following comments:

The change in the way that applicants give coordinates for units involved in air emissions now makes it impossible to go to Google Maps and get a satellite view of the polluting device. The old way of presenting coordinates was much more in the best interests of the public. LDEQ should either revert to that method or provide the old style coordinates along with the more arcane version.

Having neither the coordinates nor a diagram of the location of the proposed new pollution device impedes public assessment of its impact on nearby people, residents, workers, or the thousands of people who travel on the adjacent Interstate 10 highway. All of those people are going to breathe the extra pollution LDEQ would allow under this modification.

The large ground flare that already exists at Lotte and is associated with the process involved in this application is less than 1,400 feet away from the nearest residence. When it is in operation not only does air pollution go through the region but the noise is houseshaking.

For this one additional boiler to add 120,279 tons a year of CO<sub>2e</sub> requires a complete explanation of why (PDF Page 99) the Prevention of Significant Deterioration *de minimis* Level was NOT exceeded when that Level is 75,000 tons a year. Over 45 thousand tons in excess of a trigger level with LDEQ not invoking the full PSD review must be much more fully-addressed than with just an asterisk and a footnote saying "PSD cannot be triggered for CO<sub>2e</sub> alone."

That kind of allowance is especially-disturbing since PDF Page 6 shows how the Preliminary Screening Concentrations of Particulates, 1,3 Butadiene, and Ethylene Glycol just barely and conveniently did not quite reach the Level of Significant Impact in the company's air modeling report.

Please take another look at the LACC air emissions situation in a way that includes the air emissions from the Lotte, Eagle, and Westlake Group facilities that really comprise an inseparable, amalgamated air pollution network. By LDEQ looking at things in a piecemeal way the public suffers from a gross amount of atmospheric damage rather than the fragment apparent in each separate permit.

Thank you for the opportunity to submit these comments.

Sincerely,

Michael Tritico, Biologist and President of RESTORE  
**Restore Explicit Symmetry To Our Ravaged Earth**

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Best Regards, LT General Russel Honore (Ret) [www.generalthonore.com](http://www.generalthonore.com) (404) 227-1527 See/Smell Something, Say Something, Do Something. Take a picture Call 911